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May 20, 1998

Federal Communications Commission
1919 M Street, Room 222, NW
Washington, DC 20554

Re: RM-9267

Commissioner:

In RM-9267, the Land Mobile Communications Council has proposed a Primary reallocation of 420-430 MHz and 440-450 MHz from the Federal Government to the Private Mobile Radio Service with the Amateur Radio Service to remain as a Secondary user of this spectrum.

I request that this proposal be rejected for the following reasons:

1. The Federal Government has used this spectrum for radio location, primarily RADAR. The Amateur Radio Service, as secondary user of this spectrum, uses it for FM voice, wide area repeaters, point to point control links, digital communications, Amateur TV, satellite communications, weak signal work and experimental uses. Over the years, signal interference between these two users has been minimized due to the difference in emission modulations, by the judicious location of repeaters, and by the imposition of limits on the Effective Radiated Power of Amateur transmitters located in certain geographic areas. In essence, Amateur Radio activities on these frequencies rarely interfered with government activities and to a large extent, vice versa. The Land Mobile Communications Council proposal would place radios and repeaters using the same emissions at equal or lower power levels throughout this spectrum. The potential for mutual interference and the degradation of communications quality is such that, as the secondary user on these frequencies, the Amateur Radio Service will be forced off these frequencies or required to severely restrict activities in order to accommodate the Primary User's right to non- interference. The end result of the approval of this proposal will be to effectively remove 2/3 of the amateur allocation in the 70 cm band without having to replace this with other spectrum as required by law.

2. The Amateur 70 cm band, which encompasses frequencies from 420-450 MHz, is one of the most popular amateur bands above 30 MHz, being second only to the 2 meter amateur band. Literally thousands of repeaters, their radio control links and cross links occupy this spectrum. Propagation characteristics of higher frequency Amateur bands do not support the longer ranges obtainable in the 70 cm band. Equipment for these higher bands is less common, more expensive and more difficult to maintain. RM-9267 would effectively cripple most of the communications systems in the 70 cm Amateur band and force users onto the already over

crowded 2 meter band.

3. The Amateur community has expended a great deal of their private time and personal money over the years to set up communications systems on the 70 cm band. In the event of an emergency or natural disaster, Amateurs will use these systems to support communications for the Red Cross as well as state and local governments at no cost to these agencies. While southern California is blessed with numerous mountain ranges which are ideally suited to locating communications repeaters, these same mountains came with the curse of earthquakes. Cellular as well as regular telephones, were disrupted for several days after the Northridge Earthquake, but Amateur Radio repeaters in the 2 meter and 70 cm bands remained operational and were widely used to support disaster relief efforts. While interference from Land Mobile Communications Council users during an emergency or disaster could severely impact this Amateur Radio support to relief agencies, the lack of these assets because they were forced out of the band by RM-9267 would have a more deleterious effect.

4. I use frequencies in the 430-440 MHz range for weak signal (terrestrial, meteor scatter, moon bounce), satellite communications and FM voice on simplex and repeaters in the 440-450Mhz range. Other amateurs use portions of the 430-440 MHz range for control links and Amateur TV (ATV). Satellite allocations cannot be moved because of their use by existing satellites and international treaty. ATV requires much greater bandwidth than most emission modes and specially designed equipment whose frequencies cannot be readily changed. Weak signal work requires that its frequencies be located some distance from other modes to avoid interference from those other modes to weak signal high gain receivers. If the 420-430 MHz and 440-450 MHz ranges are effectively rendered unusable to Amateurs by approving RM-9267, it would not be feasible to relocate all 70 cm users into the remaining 10 MHz of spectrum without severely impacting all users of this spectrum.

In light of the above comments, I urge you to reject RM-9267.

Respectfully submitted

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